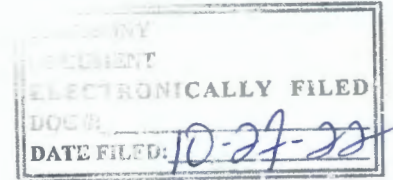


LUPKIN PLLC  
80 Broad Street, Suite 1301  
New York, NY 10004

Tel: (646) 367-2771  
Fax: (646) 219-4870  
www.lupkinpllc.com

October 26, 2022



**VIA ECF**

The Honorable Lewis A. Kaplan  
United State District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: Terra Towers Corp. et al. v. Telecom Business Solution, LLC., et al.,  
Case No. 1:22-cv-07301-LAK**

Dear Judge Kaplan:

I write on behalf of Petitioners — Terra Towers Corp., TBS Management S.A., and DT Holdings, Inc. — to request leave to file a reply memorandum exceeding the page limits set forth in Your Honor's Individual Practices.

On October 12, 2022, Respondents filed a memorandum of law in opposition to the Amended Petition (ECF Doc. No. 27). Although 35 pages in length, Respondents' memorandum includes 36 single-spaced footnotes in 10-point type. Most of these footnotes are lengthy and contain substantive argument. Had Respondents included that argument in the body of their brief, double-spaced and in 12-point type, their brief would have been closer to 45 pages in length.

We therefore respectfully ask the Court to permit Petitioners to file a reply memorandum of no more than 15 pages in length. Petitioners' reply brief is currently due on November 4, 2022.

Respectfully submitted,

/s/ Michael B. Smith  
Michael B. Smith

cc: all Counsel of Record (via ECF)

SO ORDERED

*Granted*  
LEWIS A. KAPLAN, USDJ  
10/27/22